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Attorneys for Plaintiffs
BRIGHTHOUSE LIFE INSURANCE COMPANY,
METROPOLITAN LIFE INSURANCE COMPANY,
and METLIFE REAL ESTATE LENDING, LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA - FRESNO DIVISION

METROPOLITAN LIFE INSURANCE
COMPANY, a New York corporation,

Plaintiff,

v.

ACDF, LLC, a California limited liability
company, *et al.*,

Defendants.

Lead Case No. 1:24-cv-01261-KES-SAB

Consolidated with Case Nos:
1:24-cv-01226; 1:24-cv-01230;
1:24-cv-01231; 1:24-cv-01232;
1:24-cv-01233; 1:24-cv-01235; and
1:24-cv-01241

**STIPULATION TO CONTINUE
SCHEDULING CONFERENCE;
[PROPOSED] ORDER**

Date: February 2, 2026
Time: 1:30 p.m.
Judge: Hon. Stanley A. Boone

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- ☒ Affects All Cases
☐ Affects Metropolitan Life Ins. Co. v. ACDF,
LLC, et al., 1:24-cv-01261
☐ Affects Metropolitan Life Ins. Co. v. FNF
Farms, LLC, et al., 1:24-cv-01226
☐ Affects Metropolitan Life Ins. Co. v. C & A
Farms, LLC, et al., 1:24-cv-01230
☐ Affects Metropolitan Life Ins. Co. v.
Maricopa Orchards, LLC, et al., 1:24-cv-
01231
☐ Affects Brighthouse Life Ins. Co. v. Kamm
South, LLC, et al., 1:24-cv-01232
☐ Affects Brighthouse Life Ins. Co. v.
Manning Avenue Pistachios, LLC, et al.,
1:24-cv-01233 Case No. 1:24-cv-01233
☐ Affects Brighthouse Life Ins. Co. v. ACDF,
LLC, et al., 1:24-cv-01235
☐ Affects MetLife Real Estate Lending, LLC
v. Panoche Pistachios, LLC, et al., 1:24-cv-
01241

STIPULATION TO CONTINUE
SCHEDULING CONFERENCE;
[PROPOSED] ORDER

1 TO THE HONORABLE STANLEY A. BOONE, U.S. MAGISTRATE JUDGE:

2 IT IS HEREBY STIPULATED by and between Plaintiffs Brighthouse Life Insurance
3 Company, Metropolitan Life Insurance Company, and MetLife Real Estate ending, LLC and
4 Prudential Insurance Company of America (collectively, “Plaintiffs”)¹ and Defendants² (together
5 with Plaintiffs, the “Parties”) through their respective counsel, that the Scheduling Conference
6 currently set for February 2, 2026 be continued 90-days to May 4, 2026 at 1:30 p.m.

7 The Parties respectfully request a 90-day continuance of the Initial Scheduling Conference
8 (to May 4, 2026). Sales of real property are in progress or have occurred. On December 28, 2025,
9 the Court approved Prudential Insurance Company of America’s substitution as the Plaintiff in the
10 Maricopa matter (Dkt. No. 40 in *Metropolitan Life Ins. Co. v. Maricopa Orchards, LLC, et al.*,
11 1:24-cv-01231). Counsel for Prudential has also informed the parties that Prudential intends to
12 substitute in as Plaintiff in the following matters: 1:24-cv-01261-KES-SAB; 1:24-cv-01235-KES-
13 SAB; 1:24-cv-01226-KES-SAB; and 1:24-cv-01232-KES-SAB.

14 These developments are expected to significantly narrow the scope of the discovery plan
15 and the issues to be addressed at the Initial Scheduling Conference. Given the complexity of these
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18 ¹ *Metropolitan Life Ins. Co. v. FNF Farms, LLC, et al.*, 1:24-cv-01226; *Metropolitan Life Ins. Co.*
19 *v. C & A Farms, LLC, et al.*, 1:24-cv-01230; *Metropolitan Life Ins. Co. v. Maricopa Orchards,*
20 *LLC, et al.*, 1:24-cv-01231; *Brighthouse Life Ins. Co. v. Kamm South, LLC, et al.*, 1:24-cv-01232;
21 *Brighthouse Life Ins. Co. v. Manning Avenue Pistachios, LLC, et al.*, 1:24-cv-01233; *Brighthouse*
22 *Life Ins. Co. v. ACDF, LLC, et al.*, 1:24-cv-01235; *MetLife Real Estate Lending, LLC v. Panoche*
23 *Pistachios, LLC, et al.*, 1:24-cv-01241; *Metropolitan Life Ins. Co. v. ACDF, LLC, et al.*, 1:24-cv-
24 01261.

25 ² Defendants Maricopa Orchards, LLC; ACDF, LLC, as successor by merger to 104 Partners, LLC;
26 Willow Avenue Investments, LLC; Ashlan & Hayes Investments, LLC; Grantor Fresno Clovis
27 Investments, LLC; Maricopa Orchards, LLC; Manning Avenue Pistachios, LLC; C & A Farms,
28 LLC; Cantua Orchards, LLC; FNF Farms, LLC; Panoche Pistachios, LLC; Kamm South, LLC;
Donald E. Schramm and Nada L. Schramm Revocable Trust Dated 12/2/2010; The Thomsen
Family Trust Dated 11/24/2010; Daniel L. Sweet, an individual; Carole A. Sweet, an individual;
Donald E. Schramm, an individual; Nada L. Schramm, an individual; Keith A. Thomsen, an
individual; the testate and intestate successors of Catherine S. Thomsen, deceased, and all persons
claiming by, through or under such decedent; Farid Assemi, an individual; Farshid Assemi, an
individual; and Darius Assemi, an individual (collectively, the “Defendants”). As of the time of
this filing, counsel for Plaintiffs did not receive a response or signature authorization from counsel
for Dumar, LLC and Pistache, LLC.

multi-party proceedings, the Parties request additional time to meet and confer on a discovery plan, case schedule, and the matters at issue in the various cases.

IT IS SO STIPULATED.

DATED: January 9, 2026

STOEL RIVES LLP

/s/ Michelle J. Rosales

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BRIGHTHOUSE LIFE INSURANCE

COMPANY, METROPOLITAN LIFE

INSURANCE COMPANY, and METLIFE

REAL ESTATE LENDING, LLC

DATED: January 9, 2026

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PRUDENTIAL INSURANCE COMPANY OF

AMERICA

STIPULATION TO CONTINUE
SCHEDULING CONFERENCE;
[PROPOSED] ORDER

151637479.2 0053564-00653

1 DATED: January 12, 2026

WANGER JONES HELSEY PC

2
3 /s/ Ian J. Quinn

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7 *Attorneys for Defendants*

ACDF, LLC; C&A FARMS, LLC; CANTUA

8 ORCHARDS, LLC; FNF FARMS, LLC;

KAMM SOUTH, LLC; MARICOPA

9 ORCHARDS, LLC; ASHLAN & HAYES

INVESTMENTS, LLC; PANOCHÉ

10 PISTACHIOS, LLC; WILLOW AVENUE

INVESTMENTS, LLC; MANNING AVENUE

11 PISTACHIOS, LLC; GRANTOR FRESNO

CLOVIS INVESTMENTS, LLC

12 DATED: January 9, 2026

LEVENE, NEALE, BENDER, YOO &
13 GOLUBCHIK LLP

14 /s/ Richard D. Steelman, Jr.

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17 *Attorneys for Defendants*

FARID ASSEMI, an individual, and FARSHID

18 ASSEMI, an individual.

19 DATED: January 10, 2026

MOJDEHI GALVIN REGO LLP

20
21 /s/ Ali M. Mojdehi

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23 *Attorneys for Defendants*

DARIUS ASSEMI, an individual

24
25
26
27
28
STIPULATION TO CONTINUE
SCHEDULING CONFERENCE;
[PROPOSED] ORDER

151637479.2 0053564-00653

1 DATED: January 12, 2026

BAKER MANOCK & JENSEN, PC

2
3 /s/ Dirk B. Paloutzian

4 DIRK B. PALOUTZIAN, Bar No. 173676
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6 *Attorneys for Defendants*

7 DONALD E. SCHRAMM AND NADA L.
8 SCHRAMM REVOCABLE TRUST DATED
9 12/2/2010; THE THOMSEN FAMILY TRUST
10 DATED 11/24/2010; DANIEL L. SWEET, AN
11 INDIVIDUAL; CAROLE A. SWEET, AN
12 INDIVIDUAL; DONALD E. SCHRAMM, AN
13 INDIVIDUAL; NADA L. SCHRAMM, AN
14 INDIVIDUAL; KEITH A. THOMSEN, AN
15 INDIVIDUAL; THE TESTATE AND
16 INTESATE SUCCESSORS OF
17 CATHERINE S. THOMSEN, DECEASED,
18 AND ALL PERSONS CLAIMING BY,
19 THROUGH OR UNDER SUCH DECEDENT

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ATTESTATION UNDER L.R. 131(c)

Pursuant to Civil Local Rule 131(c), I attest under the penalty of perjury that the above signatories authorized the use of an electronic signature and concurred in the filing of this document.

DATED: January 12, 2026

/s/ Michelle J. Rosales

MICHELLE J. ROSALES

ORDER

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that the Scheduling Conference currently set for February 2, 2026, at 1:30 p.m. shall be continued to May 4, 2026, at 1:30 a.m. in Courtroom 9 before the Honorable Magistrate Judge Stanley A. Boone.

IT IS SO ORDERED.

Dated: _____

UNITED STATES MAGISTRATE JUDGE